

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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JOHN KIMBLE,

Plaintiff,

v.

Case No. 07C0266

WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT,

and

JOHN DOE I AND II, AND JANE DOE I AND II,

Individually,

and in their official capacities,

Defendants.

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LOCAL RULE 16.1 PRELIMINARY PRETRIAL CONFERENCE REPORT  
AND JOINT RULE 26(f) REPORT

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Pursuant to the court's order dated July 10, 2007, the parties conferred by e-mail on July 31, 2007, in the afternoon, by telephone on August 1, 2007 in the afternoon and again by e-mail on August 1, 2007 after the telephone call. As for Local Rule 16.1, the parties state as follows:

1. This is a discrimination case brought pursuant to Title VII of the Civil Rights Act of 1964, et seq., 42 U.S.C. § 1981 and 42 U.S.C § 1983; the male African-American plaintiff claims that he was paid less than white or female counterparts employed by the State of Wisconsin.

2. The plaintiff does not contemplate any motions at this time. The defendants anticipate that they will file a motion to dismiss some of the claims and a motion for summary judgment on any remaining claims.

3. The plaintiff anticipates that he will do three rounds of written discovery and after

which he may take depositions. At the present time, the defendants anticipate they will engage in limited written discovery and conduct one or more depositions.

4. The plaintiff anticipates that he will need to amend his complaint after receipt of the answers to the first written discovery; Plaintiff requests that the date for amendment of the complaint be set at November 10, 2007, which is 30 days after Plaintiff anticipates it will receive Defendant's first discovery responses.

5. As for settlement, the plaintiff made a settlement offer to the defendants; the defendants have informed the plaintiff that they are not interested in settlement at this time.

6. The subject matter jurisdiction of this court is addressed in the pleadings; jurisdiction is conferred on this court by 42 U.S.C. § 2000e-5(f)(3) and 28 U.S.C. § 1331.

As for Fed. R. Civ. Pro. 26(f), the parties state as follows:

1. The parties will exchange the initial disclosures required by Rule 26(a)(1) by regular mail dated September 1, 2007.

2. Plaintiff's experts reports will be due December 31, 2007; Defendants' experts reports will be due no later than February 15, 2008.

3. The parties anticipate that discovery will be completed by March 31, 2008.

4. Dispositive motions will be due no later than April 30, 2008.

5. Plaintiff anticipates that he will request hard/printed copies of e-mails.

6. The parties agree that any information which may be used for identity theft such as social security numbers, bank account numbers, insurance policy numbers or any other information which might be used to access personal accounts of the individuals may be redacted by the party producing the document and shall be redacted in the event the document is presented as evidence before the court.

7. The parties do not presently anticipate changes will be necessary in the numbers of interrogatories or depositions allowed under the rules of civil procedure. Plaintiff reserves the right to request an expansion for the number of interrogatories or depositions in the event either is necessary.

Dated: August 17, 2007

s/ Brenda Lewison

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